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Attorneys for Defendant
STONEBRIDGE LIFE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JESSICA LEE, individually and on behalf of a
class of similarly situated individuals,

Plaintiff,

v.

STONEBRIDGE LIFE INSURANCE
COMPANY, a Vermont corporation, and
TRIFECTA MARKETING GROUP LLC, a
Florida limited liability company,

Defendants.

Case No. CV 11-0043-RS

**STIPULATION AND
~~PROPOSED~~ ORDER FOR
FINAL STAY OF DEADLINES**

Judge: Hon. Richard Seeborg

Action Filed: Jan. 4, 2011

1 Plaintiff Jessica Lee, Defendant Stonebridge Life Insurance Company (“Stonebridge”),
2 and Defendant Trifecta Marketing Group, LLC (“Trifecta”) (collectively the “Parties”), by and
3 through their respective counsel of record, hereby enter into the following stipulation:

4 WHEREAS, the Parties have reached a class action settlement in principle that would
5 resolve all of the claims of Plaintiff and the Class against both Stonebridge and Trifecta;

6 WHEREAS, the Court has approved stipulations between the Parties that stayed all
7 activity in this Action, including all hearings and discovery and motion deadlines, for a total
8 period of approximately 11 weeks to allow the Parties to work on a class action settlement
9 agreement and submit it to the Court for preliminary approval (Docket No. 149);

10 WHEREAS, on February 4, 2014, the Parties subsequently sought a further brief 9-day
11 extension, through February 13, to finalize the agreement, which was granted by the Court
12 (Docket Nos. 154 & 155);

13 WHEREAS, the Parties have finalized their Settlement Agreement and Exhibits.
14 However, while some signatures have been received, due to severe weather on the East Coast
15 preventing necessary signatories from traveling to work, there has been a delay in obtaining all
16 required signatures;

17 WHEREAS, the Parties request one final stay of seven (7) days, until February 20, 2014.
18 The Parties believe a further stay of all case deadlines is warranted to avoid unnecessary litigation
19 expenses and to conserve the resources of both the Parties and the Court;

20 THEREFORE, subject to the approval of the Court, the Parties agree and stipulate that
21 this Action, including all hearings and discovery and motion deadlines, shall remain stayed
22 through February 20, 2014, by which time Plaintiff shall move for preliminary approval of the
23 class action settlement agreement.

1 **IT IS SO STIPULATED.**

2
3 Dated: February 13, 2014

MORRISON & FOERSTER LLP

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5 By: /s/ Tiffany Cheung
6 TIFFANY CHEUNG
7 Attorneys for Defendant
8 STONEBRIDGE LIFE INSURANCE
9 COMPANY

10 Dated: February 13, 2014

EDELSON LLC

11 By: /s/ Ryan D. Andrews
12 RYAN D. ANDREWS
13 Attorneys for Plaintiff
14 JESSICA LEE and the class

15 Dated: February 13, 2014

LAW OFFICES OF ALEXANDER
SKLAVOS

16
17 By: /s/ Alexander E. Sklavos
18 ALEXANDER E. SKLAVOS
19 Attorney for Defendant
20 TRIFECTA MARKETING GROUP,
21 LLC

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

23
24 Dated: February 14, 2014



25 Hon. Richard Seeborg
26 United States District Judge
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